

Formosa Plastics Corporation, Texas

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July 31, 2019

Certified Mail: 7018 2290 0000 0529 7446

Air Section Manager, Region 14
Texas Commission Environmental Quality
Natural Resource Center
6300 Ocean Drive, Suite 1200
Corpus Christi, Texas 78412

RE: Formosa Plastics Corporation, Texas

TCEQ Air Quality Account No. CB-0038-Q

Second Quarter 2019 North SUMMA Canister Report

Dear Air Section Manager:

Please find attached the quarterly summary of results from the North SUMMA Canister Monitoring System. This system, and the associated FTIR, was installed as a Supplemental Environmental Project (SEP) as required by TCEQ Docket No. 2000-1144-AIR-E. The sampling requirements of the SEP have been met by FPC-TX, and sampling has been reduced to a monthly frequency. The second quarter 2019 results are shown on the attached table. Additionally, we have included wind roses generated by the weather sensor on the North FTIR or wind direction data from other air monitoring devices for each SUMMA canister sampling date during the second quarter 2019.

This report was designed to be similar to the Point Comfort SUMMA Canister Monitoring Report to maintain reporting consistency. Additionally, an electronic copy of the report has been sent to Dr. Tracie Phillips, per Mr. Darrell McCant's request.

Should you have any questions please contact Vanessa Peppers by e-mail at VanessaP@ftpc.fpcusa.com.

Sincerely,

Rick Crabtree

Vice President/General Manager Formosa Plastics Corporation, Texas

Attachments





Certified Mail: 7018 2290 0000 0529 7453

cc: Dr. Tracie Phillips

Toxicology Division

Texas Commission on Environmental Quality

P. O. Box 13087

Austin, Texas 78711-3087

FORMOSA PLASTICS CORPORATION, TEXAS

SUMMA CANISTER QUARTERLY REPORT

CALCULATION METHODOLOGY

Following is the calculation methodologies used to calculate the Year-To-Date Sum and Year-To-Date Average for the North SUMMA canister sampling site. Please note, there are two columns associated with each component analyzed. The column titled "Actual" represents the results reported by the independent laboratory contracted to analyze the SUMMA canisters. The column titled "1/2 Reported LOD (Limit of Detection)" represents either the actual result or onehalf the limit of detection reported by the laboratory, as appropriate.

ACTUAL

The following is entered into the column titled "Actual":

Numerical Value -Actual results reported by the independent laboratory when the result is equal to or greater than the limit of detection. numerical value is used to calculate the year-to-date sum and the

year-to date average;

As reported by the laboratory. The value of "0" is used to calculate ND (Non Detect) the year to date sum and the year-to-date average;

BDL (Below Detection Limit) - Entered when the actual result is less than the reported limit of detection. The value of "0" is used to calculate the year-todate sum and the year-to-date average;

Non operational sampling period.

1/2 REPORTED LOD (LIMIT OF DETECTION)

The following is entered into the column titled "1/2 Reported LOD":

Numerical Value -Actual results reported by the independent laboratory when the result is equal to or greater than the limit of detection. numerical value is used to calculate the year-to-date sum and the year-to-date average;

½ the Reported Limit of Detection - ½ the reported limit of detection when the results are reported as non-detect and when the actual result is below the detection limit (BDL). 1/2 the reported limit of detection is used to calculate the year-to-date sum and the year-to-date average.

Non operational sampling period.

FORMOSA PLASTICS CORPORATION, TEXAS

SUMMA CANISTER QUARTERLY REPORT

Limit of Detection (LOD) - Method Detection Limit, Limit of Detection, Reporting Limit, etc... as reported by the independent laboratory conducting the analysis.

DUPLICATE SAMPLES

The duplicate samples are reported discreetly on a separate VOC Canister Analysis Table. This is done so that the duplicate samples can be compared to the routine samples and the Relative Percent Difference (RPD) can be calculated. The RPD is calculated using the following equation:

$$\{(X1-X2) / [(X1+X2) / 2]\} \times 100$$

Where the duplicate and routine sample indicated "ND", the RPD is reported as "ND". Where the duplicate or routine sample indicated "ND" and the other indicated a concentration greater than ND, the RPD is calculated by using the value entered in the actual concentration column and the value entered in the ½ Reported LOD column.

YEAR-TO-DATE SUM

The year-to-date sum is calculated by taking the sum of all values entered in the column.

YEAR-TO-DATE AVERAGE

The following formula is used to calculate the year-to-date average:

Year-To-Date Sum / (Number of theoretical sample periods - Number of non operational sample periods)

FORMOSA VOC CANISTER ANALYSIS 2nd QUARTER 2019 NORTH SITE

SAMPLE DATE	AVG.WIND		ETHY	ETHYLENE	1,3 BUT	1,3 BUTADIENE	BENZ	BENZENE	VINYL CI	VINYL CHLORIDE	ETHYLENE	ETHYLENE DICHLORIDE
	WIND	AVG. WIND	Actual	1/2 Reported LOD	Actual	1/2 Reported LOD	Actual	1/2 Reported	Actual	1/2 Reported		1/2 Reported
	(Degrees)	SPEED (mph)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(ppb)	(qaa)	(nnh)	(qua)
07/28/18	322	6.8	*	*	*	*	*	*	*	*	*	*
08/31/18	158	14.5	QN	0.0500	ND	0.1250	0.4360	0.4360	0.1630	0.1630	0928 0	03380
09/30/18	160	13.9	ND	0.0500	ND	0.1250	ND	0.0500	QN	0.0500	CN CIN	0.500
10/28/18	4	196.4	ND	0.0500	ND	0.1250	ND	0.0500	ND	0.0500	QX	0.0500
11/27/18	2	94	*	*	*	*	*	*	*	*	*	*
12/27/18	152	3.3	ND	0.0500	ND	0.1250	0.2980	0.2980	ND	0.0500	0.1320	0.1320
01/16/19	114	7.3	ND	0.0500	ND	0.1250	0.3410	0.3410	QN	0.0500	GN	0.0500
02/21/19	26	8.9	ND	0.0500	ND	0.1250	0.2130	0.2130	ND	0.0500	QN	0.0500
03/23/19	137	12.0	*	*	*	*	*	*	*	*	*	*
04/30/19	146	17.0	2.1700	2.1700	ND	0.0329	0.2580	0.2580	0.2090	0.2090	CN	0.0329
05/30/19	133	7.6	2.1400	2.1400	0.1250	0.1250	0.3330	0.3330	0.0994	0.0994	E G	0.0389
06/29/19	165	4.1	2.0800	2.0800	0.1510	0.1510	0.6250	0.6250	N N	0.0383	QN	0.0383

	ЕТН	CTHYLENE	1,3 BUT	3 BUTADIENE	BEN	BENZENE	VINYL C	VINYL CHLORIDE	ETHYLENE	ETHYLENE DICHLORIDE
	Actual	1/2 Reported LOD	Actual	1/2 Reported LOD	Actual	1/2 Reported LOD	Actual	1/2 Reported LOD		1/2 Reported LOD
	(qdd)	(pdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)
Year-To-Date Sum	6.3900	0069'9	0.2760	1.0589	2.5040	2,6040	0.4714	0.7597	0.4680	09770
								0.1.571	0.1000	0.11.00
Rolling Year Average	0.7100	0.7433	0.0307	0.1177	0.2782	0.2893	0.0524	0.0844	0.0520	0.0864
7 .		4 .							2012	10000
Annual Average	1.2780	1.2980	0.0552	0.1118	0.3540	0.3540	0.0617	0.0893	0.000	0.0420

12 12 12 Number of non operational sample periods Number of theoretical sample periods

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* - non operational, data from the North site was used for Wind Direction and Wind Speed, if available a - Wind rose attached

d - Duplicate sample taken in addition to the routine sample (See Calculation Methodology for information on inclusion of duplicate sample results.)

ation	(qdd		1	2		
Investigation	Limit (ppb)	25	29.7	28.2	500	25
TCEQ Air Monitoring Comparison Values (ppb)	ΓT	0.47	0.72	1.4	30	6
TCEQ Air Comparison	LS	27,000	94	180	500,000	1,700
	Chemical	Vinyl Chloride	Ethylene Dichloride	Benzene	Ethylene	1, 3 Butadiene

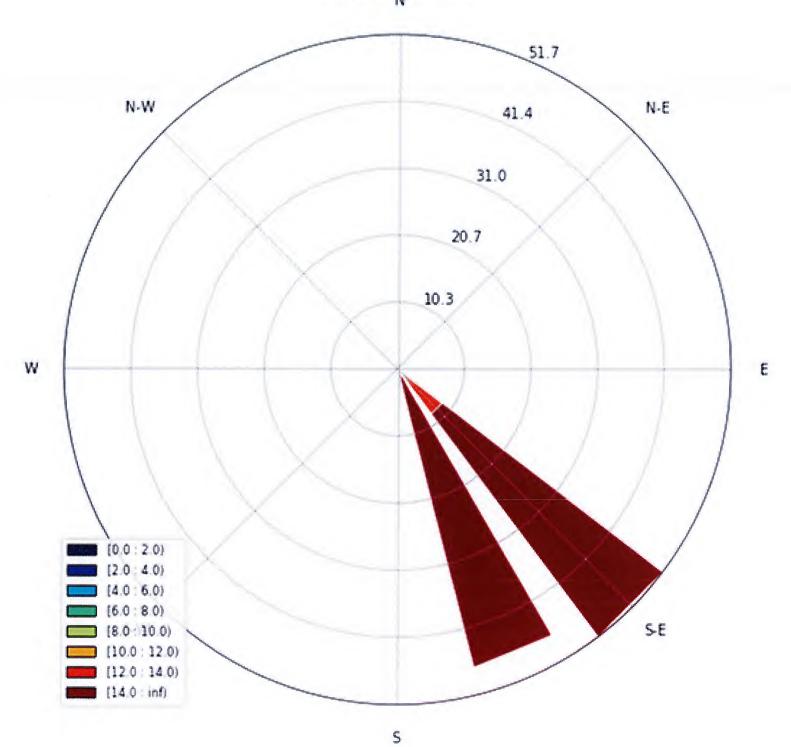
	TCEQ Air	TCEQ Air Monitoring	;
	Comparison	Comparison values (ppb)	Investigation
Chemical	$\mathbf{L}\mathbf{S}$	$_{ m LT}$	Limit (ppb)
Vinyl Chloride	27,000	0.47	25
Ethylene Dichloride	94	0.72	29.7
Benzene	180	1.4	28.2
Ethylene	500,000	30	500
, 3 Butadiene	1,700	6	25

Summary of Non-operational Periods - 2nd Quarter 2019

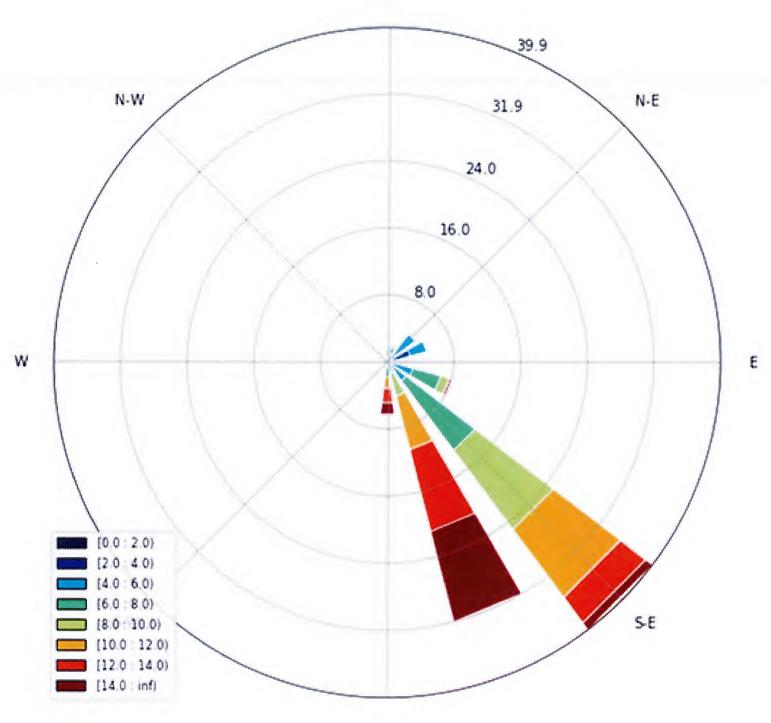
North Site SUMMA Canister System

Date (s) Corrective Action	No downtime during second quarter 2019.
Date (s)	
SUMMA Site	

FN: April 30 2019



FN: May 30 2019



FN: June 29 2019

